

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO <i>ex rel.</i>)	
State Engineer,)	
)	
Plaintiff,)	No. 69cv7941 BB
)	
v.)	RIO CHAMA Stream System
)	
ROMAN ARAGON, <i>et al.</i> ,)	Wild & Scenic River Section
)	
Defendants.)	
)	

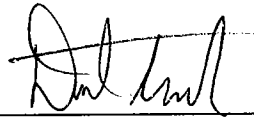
MOTION FOR LEAVE TO FILE A LATE JOINT STATUS REPORT

COMES NOW the United States and the State of New Mexico (“parties”), and respectfully requests the Court for leave to file the Joint Status Report which was required to have been filed by January 31, 2008 pursuant to the Special Master’s *Second Amendment to Scheduling Order for Adjudication of Wild and Scenic River Claim* (Doc. No. 8790) filed September 7, 2007. Leave is warranted for the following reasons:

1. Counsel for the United States was out of the office on depositions and other matters for most of the two weeks proceeding January 31, 2008. Similarly, Counsel for the State was out of the office much of the week proceeding January 31, 2008.
2. Counsel’s extended absences made coordinating with clients and each other difficult. Consequently, Counsel prepared, and are filing, the Joint Status Report as quickly as possible upon their return to their offices.

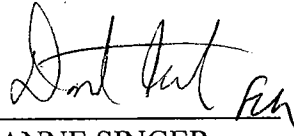
WHEREFORE, the parties respectfully requests the court to grant their Motion and allow them to file their Joint Status Report on the Wild and Scenic River Claims on February 6, 2008.

DATED this 6th day of February, 2008.



DAVID W. GEHLERT
U.S. Department of Justice
Environment & Natural
Resources Division
Natural Resources Section
1961 Stout Street, 8th Floor
Denver, Colorado 80294
Phone: (303) 844-1386
Fax: (303) 844-1350
*Attorney for Plaintiff United
States of America*

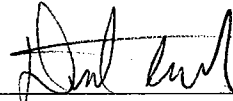
Respectfully Submitted,



ARIANNE SINGER
Special Assistant Attorney General
New Mexico Office of the State Engineer
P.O. Box 25102
Santa Fe, NM 87504-5102
(505) 827-6150
*Attorney for Plaintiff State of
New Mexico*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of February, 2008 I filed the foregoing electronically through the CM/ECF system which cased the following parties on the electronic service list, set forth in the Notice of Electronic Filing, to be served via email.



David W. Gehlert

Arianne Singer
Special Assistant Attorney General
Office of the State Engineer
PO Box 25102
Santa Fe, NM 87504-5102

John W. Utton
Sheehan, Sheehan & Stelzner, PA
PO Box 271
Albuquerque, NM 87103-0271

Fred Waltz
PO Box 6390
Taos, NM 87571